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 10 *Attorney for Defendants*
 11 *Portfolio Recovery Associates, LLC*

12 **UNITED STATES DISTRICT COURT**

13 **FOR THE DISTRICT OF NEVADA**

14 DELANIE BUTLER and JOHN ROBINSON,
 15 individually and on behalf of all similarly situated
 16 class and collective action members,

17 Plaintiffs,

18 vs.

19 PORTFOLIO RECOVERY ASSOCIATES, LLC, a
 20 Delaware Limited Liability Company; DOES I
 21 through X, inclusive; ROE CORPORATIONS I
 22 through X inclusive,

23 Defendants.

24 Case No.: 2:20-cv-00861-JCM-EJY

25 **STIPULATION AND ORDER FOR
 26 EXTENSION OF TIME TO FILE
 27 THE DISCOVERY PLAN AND
 28 SCHEDULING ORDER**

(*First Request*)

29 Pursuant to LR IA 6-1, LR IA 6-2, LR 7-1 and LR 26-1, Plaintiffs DELANIE BUTLER and
 30 JOHN ROBINSON (collectively “Plaintiffs”) and Defendant PORTFOLIO RECOVERY
 31 ASSOCIATES, LLC (Defendant), by and through their respective counsel of record, hereby submit
 32 their first request for an extension of time of ten days up to and including Thursday, September 3,
 33 2020, for the parties to file the proposed Discovery Plan and Scheduling Order (“DPSO”). The
 34 present deadline is August 24, 2020. This is the parties’ first request for an extension of time to
 35 extend the deadline to file the DPSO.

36 Good cause exists to extend the deadline to file the parties’ DPSO in this matter. On July 31,
 37 2020, the Court granted the parties stipulation and order to sever hourly wage and hour claims and
 38 transfer those claims to the Eastern District of Virginia. Thereafter, on August 6, 2020, the counsel

1 for McGuire Woods, who had previously appeared pro hac vice, withdrew as counsel to further
2 represent Defendant in the transferred matter in the Eastern District of Virginia. The parties
3 subsequently exchanged telephone calls and correspondence to schedule the FRCP Rule 26(f).
4 Plaintiffs have prepared their proposed DPSO, and Defendant is reviewing their proposal to
5 determine additional or alternate discovery provisions. Due to Defendant's counsel's deposition
6 schedule in the last ten days, the parties have agreed to have an FRCP 26(f) discovery conference
7 during the week of August 24, 2020, to discuss both parties' requested discovery provisions and the
8 required parameters to include in the DPSO as required per FRCP 26. Therefore, the parties would
9 like additional time to discuss the proposed language with their respective clients and see if they can
10 come to some form of resolution before submitting separate DPSOs for the Court's consideration.
11 As such, the parties stipulate to an extension of ten (10) days to afford the parties a reasonable period
12 of time to meet and confer on the content of the proposed DPSO.

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1 This stipulation is made in good faith and is not intended for purposes of delay.

2 **IT IS SO STIPULATED:**

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4 DATED this 21st day of August 2020.
HUTCHINGS LAW GROUP, LLC

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6 DATED this 21st day of August 2020.
OGLETREE, DEAKINS, NASH, SMOAK & STEWART

7 /s/ Mark H. Hutchings
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19 *Attorneys for Plaintiffs Delanie Butler and*
20 *John Robinson individually and on behalf of*
21 *all similarly situated class and collective*
22 *action members*

23 *Attorneys for Defendant Portfolio Recovery*
24 *Associates, LLC*

25 **IT IS SO ORDERED.**

26 **ORDER**

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28 _____
29 UNITED STATES MAGISTRATE JUDGE

30 August 24, 2020

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32 DATED